

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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February 24, 2023


BY ECF

Honorable Judge Ronnie Abrams
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Irving Cartagena, et al.
22 Cr. 92 (RA)

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
February 24, 2023

Dear Judge Abrams,

On behalf of all defense counsel and the government, I write to request a 3-week adjournment of the due date for defense motions. The government is in the process of seeking approval for plea offers and anticipates extending offers soon. An additional adjournment would allow the government to extend these plea offers and would provide defense counsel with time to review offers with their clients, likely obviating the need for pretrial motions or trial.

Under the current schedule, defense motions are due on February 24, the government's response is due on March 10, and defense replies are due on March 17. Should the Court grant an adjournment, the dates would shift to March 17, March 31, and April 7. This would still leave sufficient time for the Court to review and rule on motions before the May 15 trial date in this matter. As noted above, the Government consents to this adjournment request and the proposed timeline for motions.

Thanks you for your consideration.

Respectfully submitted,
/s/ _____
Zawadi Baharanyi
Assistant Federal Defender of New York
Counsel for Hector Robles

cc: All counsel.

SO ORDERED:

HONORABLE RONNIE ABRAMS
United States District Judge